

**Exhibit C**

**Combined Budget and Staffing Plan**

**In re Lordstown Motors Corp. et al.**  
**White & Case Fee Lookback and Forward Estimate**

The Debtors filed their chapter 11 petitions on June 27, 2023. Initially, White & Case estimated that its fees from the Petition Date through July 31, 2023 (~1 month) would be \$1.1 - \$1.5 million. As noted, the estimate was preliminary and subject to substantial revision, including if the chapter 11 cases or other matters proved to be contentious, were shorter or longer than expected, or there were unforeseen events. On August 23, 2023, White & Case estimated that its fees would be \$1.6 - \$2.2 million per month for the months of August, September, and October. On or about October 25, 2023, White & Case estimated that its fees would be \$1.3 - \$1.6 million for October and the following months for services anticipated to be provided.

The following chart breaks down by project category White & Case's fees incurred from the Petition Date through October 31, 2023. Note that this includes both finalized and preliminary figures as not all fees for such time period have been finalized yet. Note also that this does not include expenses incurred in relation to the services White & Case is providing.

<b>No.</b>	<b>Project Category Description</b>	<b>Hours</b>	<b>Fees</b>
<b>B01</b>	Asset Analysis, Sale & Disposition	1,061.6	\$1,418,834.00
<b>B02</b>	Automatic Stay Issues	185.4	\$208,792.00
<b>B03</b>	Avoidance Actions & Other Asset Recovery	0.0	\$0.00
<b>B04</b>	Business Operations, Vendor & Utility Issues	63.2	\$85,210.00
<b>B05</b>	Case Administration	93.4	\$94,841.00
<b>B06</b>	Case Strategy	141.3	\$207,441.00
<b>B07</b>	Claims Administration & Objections	244.4	\$311,358.00
<b>B08</b>	Corporate Advice & Board Meetings	83.2	\$133,373.00
<b>B09</b>	Creditor Meetings & Statutory Committees	249.6	\$287,232.00
<b>B10</b>	Disbursement	0.0	\$0.00
<b>B11</b>	Discovery	0.0	\$0.00
<b>B12</b>	Exclusivity, Plan & Disclosure Statement	951.1	\$1,329,198.00
<b>B13</b>	Executory Contracts & Unexpired Leases	144.1	\$178,552.00
<b>B14</b>	First Day Pleadings	173.2	\$227,243.00
<b>B15</b>	Hearings & Court Matters	246	\$367,702.00
<b>B16</b>	Insurance Issues	66.4	\$82,754.00
<b>B17</b>	Litigation	1,121.2	\$1,543,715.00
<b>B18</b>	Nonworking Travel	0.0	\$0.00
<b>B19</b>	Professional Retention & Fees – W&C	64.8	\$73,935.00
<b>B20</b>	Professional Retention & Fees – Other	129.6	\$161,219.00
<b>B21</b>	Reports, Schedules & U.S. Trustee Issues	291.9	\$395,757.00
<b>B22</b>	Tax Issues	54.6	\$71,579.00
<b>B23</b>	Employee Issues	83.2	\$113,277.00
	<b>GRAND TOTAL</b>	<b>5,448.2</b>	<b>\$7,292,012.00</b>

Looking forward, White & Case estimates its fees will be \$1.3 - \$1.6 million for November and the following months for services anticipated to be provided. We expect that approximately three-fourths of the legal spend will be related to either the chapter 11 plan and solicitation thereof, employee matters, claims matters, or litigation matter (which may vary). Below is a chart illustrating how estimated legal spend might break down by project category.

<b>No.</b>	<b>Project Category Description</b>	<b>Hours</b>	<b>Fees</b>
<b>B01</b>	Asset Analysis, Sale & Disposition	[14-19]	\$16,000-\$20,000
<b>B02</b>	Automatic Stay Issues	[0]	\$0
<b>B03</b>	Avoidance Actions & Other Asset Recovery	[0]	\$0
<b>B04</b>	Business Operations, Vendor & Utility Issues	[101-126]	\$112,000-\$138,000
<b>B05</b>	Case Administration	[18-23]	\$20,000-\$25,000
<b>B06</b>	Case Strategy	[32-41]	\$36,000-\$45,000
<b>B07</b>	Claims Administration & Objections	[186-230]	\$205,000-\$252,000
<b>B08</b>	Corporate Advice & Board Meetings	[12-16]	\$14,000-\$17,000
<b>B09</b>	Creditor Meetings & Statutory Committees	[0]	\$0
<b>B10</b>	Disbursement	[0]	\$0
<b>B11</b>	Discovery	[0]	\$0
<b>B12</b>	Exclusivity, Plan & Disclosure Statement	[297-366]	\$327,000-\$402,000
<b>B13</b>	Executory Contracts & Unexpired Leases	[2-4]	\$3,000-\$4,000
<b>B14</b>	First Day Pleadings	[0]	\$0
<b>B15</b>	Hearings & Court Matters	[60-76]	\$67,000-\$83,000
<b>B16</b>	Insurance Issues	[0]	\$0
<b>B17</b>	Litigation	[238-293]	\$262,000-\$322,000
<b>B18</b>	Nonworking Travel	[0]	\$0
<b>B19</b>	Professional Retention & Fees – W&C	[20-27]	\$23,000-\$29,000
<b>B20</b>	Professional Retention & Fees – Other	[5-7]	\$6,000-\$7,000
<b>B21</b>	Reports, Schedules & U.S. Trustee Issues	[37-46]	\$41,000-\$50,000
<b>B22</b>	Tax Issues	[3-5]	\$4,000-\$5,000
<b>B23</b>	Employee Issues	[149-183]	\$164,000-\$201,000
	<b>GRAND TOTAL</b>	<b>[1174-1462]</b>	<b>\$1,300,000-\$1,600,000</b>

The above estimates, project categories, and estimates by project categories are subject to substantial revision, including if the chapter 11 cases or other matters prove to be contentious, are shorter or longer than expected, or there are other unforeseen events. White & Case notes that chapter 11 cases and other matters can involve significant uncertainty, which makes it inherently difficult to predict the full scope and magnitude of services that will be provided.

**In re Lordstown Motors Corp. et al.**  
**White & Case LLP Staffing**

Included below is White & Case's current staffing plan for advising Lordstown Motors Corp. and certain of its affiliates as debtors and debtors-in-possession (collectively, "Debtors") in their chapter 11 cases. Representing Debtors generally requires the work of lawyers across several practice areas, including financial restructuring and insolvency, corporate/M&A, litigation, tax, and others. Additional expertise may also be required depending upon the circumstances and events in the particular chapter 11 case, which cannot be predicted with certainty.

The staffing plan below, therefore, represents only White & Case's current best estimate of certain of the lawyers who will be materially involved during the chapter 11 cases. The staffing plan is subject to substantial change, and additional or fewer attorneys may become involved as circumstances dictate. It is also anticipated that the level of involvement of the listed and unlisted attorneys will vary depending upon the circumstances.

Thomas E Lauria (Financial Restructuring & Insolvency) will lead White & Case's representation of the Debtors with the assistance of other partners, counsel, associates, and paraprofessionals, including, without limitation, partners Jason Zakia (Commercial Litigation), Gregory Pryor (M&A - Corporate), and David Turetsky (Financial Restructuring & Insolvency).

From the Petition Date through October 31, 2023, White & Case has billed or expects to bill the following number of timekeepers:

<b>Category</b>	<b>Jul.<sup>1</sup></b>	<b>Aug.</b>	<b>Sep.</b>	<b>Oct.</b>	<b>Average Hourly Rate<sup>2</sup></b>	<b>Range of Hourly Rates<sup>3</sup></b>
Partners	8	9	9	8	\$1,522	\$1,370 - \$2,100
Counsel	2	2	1	2	\$1,227	\$1,310
Associates	12	14	12	11	\$932	\$740 - \$1,270
Paraprofessionals <sup>4</sup>	1	1	1	2	\$391	\$215 - \$640

For November and thereafter, we expect staffing levels to remain the same or fall slightly. Going forward, we expect that the following timekeepers are likely to provide services on this matter.

<sup>1</sup> Petition Date through July 31, 2023

<sup>2</sup> The Average Hourly Rate was calculated by dividing the total dollar amount invoiced by the total number of hours invoiced for all U.S. timekeepers to all restructuring matters invoiced from June 1, 2022 through May 31, 2023.

<sup>3</sup> The Range of Hourly Rates represents the rates of all U.S. timekeepers with the Firm for calendar year 2023, and is not necessarily limited to those U.S. timekeepers who may work on the matter nor does it reflect the rates charged by timekeepers located outside the U.S.

<sup>4</sup> This category may include certain staff who have passed the bar, but whom the firm bills at paraprofessional rates.

<b>Title</b>	<b>Name</b>	<b>Group</b>	<b>Rate</b>
<b>Partner</b>	Thomas E Lauria	Financial Restructuring & Insolvency	\$2,100
	David Dreier	Tax Practice	\$1,950
	Gregory Pryor	M&A - Corporate	\$1,950
	Jason Zakia	Commercial Litigation	\$1,750
	David Turetsky	Financial Restructuring & Insolvency	\$1,750
	Roberto Kampfner	Financial Restructuring & Insolvency	\$1,590
<b>Counsel</b>	Fan He	Financial Restructuring & Insolvency	\$1,310
	Jesse Green	Commercial Litigation	\$1,310
<b>Associate</b>	Doah Kim	Financial Restructuring & Insolvency	\$1,270
	Stephen E. Ludovici	Financial Restructuring & Insolvency	\$1,240
	RJ Szuba	Financial Restructuring & Insolvency	\$1,140
	Sequoia Kaul	Commercial Litigation	\$1,060
	Livy Mezei	Financial Restructuring & Insolvency	\$1,020
	Coleman Saunders	Commercial Litigation	\$960
	Peter Strom	Financial Restructuring & Insolvency	\$960
	Aditi Padmanabhan	Commercial Litigation	\$740
<b>Paraprofessional</b>	Deanna Hirshorn	Financial Restructuring & Insolvency	\$380
	Katie Wick	Financial Restructuring & Insolvency	\$380